

SEALED**United States District Court**for the
District of Utah

UNITED STATES OF AMERICA

V.

Case No: 2:22cr00295 TS

Altalibi, et al**ARREST WARRANT**To: The United States Marshal
and any authorized law enforcement officerYOU ARE HEREBY COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) **ROBLE ABDINOOR**,

who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information
 Complaint Order of court Violation Notice Probation Violation Petition
 Supervised Release Violation Petition

This offense is briefly described as follows:

Conspiracy to Distribute 3,4-Methylenedioxypyrovalerone (MDPV), aPyrrolidinopentiophenone (a-PVP), and a-Pyrrolidinohexiophenone (a-PHP); Conspiracy to Commit Money Laundering; Possession of a-Pyrrolidinohexiophenone (a-PHP) with Intent to Distribute

in violation of **21:841(a)(1) and 846, 18:1956(h)**

United States Code.



Gary Serdar

Name of Issuing Officer

Amy Faust

Signature of Issuing Officer

Clerk of Court

Title of Issuing Officer

August 17, 2022 at Salt Lake City, Utah

Date and Location

By: Amy Faust
Deputy Clerk

Bail fixed _____ by _____

Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at _____

TRINA A. HIGGINS, United States Attorney (#7349)
 SETH NIELSEN, Special Assistant United States Attorney (#13823)
 VERNON G. STEJSKAL, Assistant United States Attorney (#8434)
 Attorneys for the United States of America
 111 South Main Street, Suite 1800
 Salt Lake City, Utah 84111
 Telephone: (801) 524-5682

SEALED

IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAAFAR ALTALIBI,
 MOUNTAZAR ALTALIBI,
 HAYDAR ALTALIBI,
 DAVID LOVATO,
 ALLEN JERVIS,
 HANNAH TAYLOR,
 SAMANTHA BARBER,
 a/k/a Samantha Olsen,
 ROBLE ABDINOOR,
 FARIS MUSA,
 HUSSEIN ALSALEMI,
 SMOKERS HAVEN J, LLC, and
 LAKE CITY AUTO SALES, LLC,

Defendants.

INDICTMENT

Count 1: 21 U.S.C. §§ 841(a)(1) and 846,
 Conspiracy to Distribute 3,4-
 Methylenedioxypyrovalerone (MDPV), α -
 Pyrrolidinopentiophenone (α -PVP), and α -
 Pyrrolidinohexiophenone (α -PHP) (All
 Defendants);
 Count 2: 18 U.S.C. § 1956(h), Conspiracy to
 Commit Money Laundering (All Defendants);
 Count 3: 21 U.S.C. §§ 841(a)(1) and 846,
 Attempted Possession of α -
 Pyrrolidinohexiophenone (α -PHP) with Intent to
 Distribute (Mountazar Altalibi);
 Count 4: 21 U.S.C. § 841(a)(1) and 846,
 Attempted Possession of α -
 Pyrrolidinohexiophenone (α -PHP) with Intent to
 Distribute (Jaafar Altalibi and Taylor);
 Count 5: 21 U.S.C. § 841(a)(1) and 846,
 Attempted Possession of α -
 Pyrrolidinohexiophenone (α -PHP) with Intent to
 Distribute (Jaafar Altalibi and Taylor);
 Count 6: 21 U.S.C. § 841(a)(1), Possession of α -
 Pyrrolidinohexiophenone (α -PHP) with Intent to
 Distribute (Jaafar Altalibi);
 Count 7: 21 U.S.C. § 841(a)(1) and 846,
 Distribution of α -Pyrrolidinohexiophenone (α -
 PHP) (Mountazar Altalibi);
 Count 8: 21 U.S.C. § 841(a)(1), Distribution of
 α -Pyrrolidinohexiophenone (α -PHP) (Jaafar
 Altalibi and Jervis);

Case: 2:22-cr-00295
 Assigned To : Stewart, Ted
 Assign. Date : 8/16/2022

	Count 9: 21 U.S.C. § 841(a)(1), Distribution of α -Pyrrolidinohexiophenone (α -PHP) (Mountazar Altalibi); Count 10: 21 U.S.C. § 841(a)(1), Distribution of α -Pyrrolidinohexiophenone (α -PHP) (Mountazar Altalibi); Count 11: 21 U.S.C. § 841(a)(1), Possession of α -Pyrrolidinohexiophenone (α -PHP) (Mountazar Altalibi); Count 12: 21 U.S.C. § 841(a)(1), Possession of α -Pyrrolidinohexiophenone (α -PHP) (Mountazar Altalibi and Roble Abdinoor)
--	---

The Grand Jury charges:

COUNT I

21 U.S.C. §§ 841(a)(1) and 846

(Conspiracy to Distribute 3,4-Methylenedioxypyrovalerone (MDPV), α -Pyrrolidinopentiophenone (α -PVP), and α -Pyrrolidinohexiophenone (α -PHP))

Beginning at a date unknown, but not later than November 2011, and continuing through at least August 17, 2022, within the District of Utah and elsewhere,

JAAFAR ALTALIBI,
MOUNTAZAR ALTALIBI,
HAYDAR ALTALIBI,
DAVID LOVATO,
ALLEN JERVIS,
HANNAH TAYLOR,
SAMANTHA BARBER, a/k/a Samantha Olsen,
ROBLE ABDINOOR,
FARIS MUSA,
HUSSEIN ALSALEMI,
SMOKERS HAVEN J, LLC, and
LAKE CITY AUTO SALES, LLC,

defendants herein, did knowingly and intentionally conspire with others known and unknown to distribute 3,4-Methylenedioxypyrovalerone (MDPV), α -Pyrrolidinopentiophenone (α -PVP), and α -Pyrrolidinohexiophenone (α -PHP), all Schedule I controlled substances within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT II

18 U.S.C. § 1956(h)

(Conspiracy to Commit Money Laundering)

Beginning on a date unknown to the Grand Jury, but not later than November 2011, and continuing through at least August 17, 2022, within the District of Utah and elsewhere,

JAAFAR ALTALIBI,
MOUNTAZAR ALTALIBI,
HAYDAR ALTALIBI,
DAVID LOVATO,
ALLEN JERVIS,
HANNAH TAYLOR,
SAMANTHA BARBER, a/k/a Samantha Olsen,
ROBLE ABDINOOR,
FARIS MUSA,
HUSSEIN ALSALEMI,
SMOKERS HAVEN J, LLC, and
LAKE CITY AUTO SALES, LLC,

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to commit the following offenses against the United States of America in violation of Title 18, United States Code, Section 1956:

- (a) to knowingly conduct and attempt to conduct financial transactions, such as the purchase and sale of controlled substances; bank deposits, withdrawals, and

transfers; wire transfers; the purchase of properties, inventory, vehicles and jewelry; purchase and use of cryptocurrency; and PayPal transactions, all affecting interstate commerce, which involved the proceeds of specified unlawful activity, specifically,

- i. the illegal buying, selling, and dealing in controlled substances as detailed in COUNT I above, in violation of Title 21, United States Code, Section 841(a)(1) and 846;

with the intent to promote the carrying on of specified unlawful activity, outlined in (i) above, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(A)(i); and

- (b) to knowingly conduct and attempt to conduct financial transactions, such as the purchase and sale of controlled substances; bank deposits, withdrawals, and transfers; wire transfers; the purchase of properties, inventory, vehicles and jewelry; purchase and use of cryptocurrency; and PayPal transactions, all affecting interstate commerce, which involved the proceeds of specified unlawful activity, specifically,

- i. the illegal buying, selling, and dealing in controlled substances as detailed in COUNT I above, in violation of Title 21, United States Code, Section 841(a)(1) and 846;

knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(1)(B)(i); and

- (c) to knowingly engage in a monetary transaction involving funds that were the proceeds of criminally derived property in excess of \$10,000, and were derived from a specified unlawful activity, specifically,
 - i. the illegal buying, selling, and dealing in controlled substances as detailed in COUNT I above, in violation of Title 21, United States Code, Section 841(a)(1) and 846;

all of which was done in violation of 18 U.S.C. § 1956(h); and punishable pursuant to 18 U.S.C. § 1956(a)(1).

COUNT III
21 U.S.C. § 841(a)(1) and 846

(Attempted Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about May 22, 2020, in the District of Utah,

MOUNTAZAR ALTALIBI,

defendant herein, did knowingly and intentionally attempt to possess with intent to distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 841(a)(1) and 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT IV

21 U.S.C. § 841(a)(1) and 846

(Attempted Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about July 21, 2020, in the District of Utah,

JAAFAR ALTALIBI, and
HANNAH TAYLOR,

defendants herein, did knowingly and intentionally attempt to possess with intent to distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 841(a)(1) and 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT V

21 U.S.C. § 841(a)(1) and 846

(Attempted Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about October 26, 2020, in the District of Utah,

JAAFAR ALTALIBI, and
HANNAH TAYLOR,

defendants herein, did knowingly and intentionally attempt to possess with intent to distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 841(a)(1) and 846, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT VI

21 U.S.C. § 841(a)(1)

(Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about December 18, 2020, in the District of Utah,

JAAFAR ALTALIBI,

defendant herein, did knowingly and intentionally possess with intent to distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT VII

21 U.S.C. § 841(a)(1) and 846

(Distribution of α -Pyrrolidinohexiophenone (α -PHP))

On or about November 10, 2021, in the District of Utah,

MOUNTAZAR ALTALIBI,

defendant herein, did knowingly and intentionally distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT VIII

21 U.S.C. § 841(a)(1)

(Distribution of α -Pyrrolidinohexiophenone (α -PHP))

On or about April 14, 2022, in the District of Utah,

JAAFAR ALTALIBI, and
ALLEN JERVIS,

defendants herein, did knowingly and intentionally distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT IX

21 U.S.C. § 841(a)(1)

(Distribution of α -Pyrrolidinohexiophenone (α -PHP))

On or about April 26, 2022, in the District of Utah,

MOUNTAZAR ALTALIBI,

defendant herein, did knowingly and intentionally distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT X

21 U.S.C. § 841(a)(1)

(Distribution of α -Pyrrolidinohexiophenone (α -PHP))

On or about June 6, 2022, in the District of Utah,

MOUNTAZAR ALTALIBI, and
FARIS MUSA,

defendants herein, did knowingly and intentionally distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT XI

21 U.S.C. § 841(a)(1)

(Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about June 27, 2022, in the District of Utah,

MOUNTAZAR ALTALIBI, and
FARIS MUSA,

defendants herein, did knowingly and intentionally possess with intent to distribute α -

Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

COUNT XII

21 U.S.C. § 841(a)(1)

(Possession of α -Pyrrolidinohexiophenone (α -PHP) with Intent to Distribute)

On or about July 21, 2022, in the District of Utah,

MOUNTAZAR ALTALIBI, and
ROBLE ABDINOOR,

defendants herein, did knowingly and intentionally possess with intent to distribute α -Pyrrolidinohexiophenone (α -PHP), a Schedule I controlled substance within the meaning of 21 U.S.C. § 812, and did aid and abet therein; all in violation of 21 U.S.C. § 841(a)(1), and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 21 U.S.C. § 853, upon conviction of any offense violating 21 U.S.C. § 841, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s).

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1956(h), the defendants shall forfeit to the United States of America any

property, real or personal, involved in such violations, and any property traceable to such property.

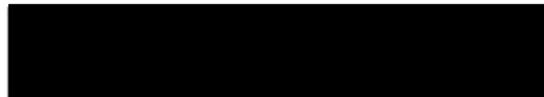
The property to be forfeited is detailed in, but is not limited to, that listed in ATTACHMENT 1, which is attached to and incorporated herein by reference.

GRAND JURY'S PROBABLE CAUSE FINDING REGARDING FORFEITURE

The Grand Jury finds probable cause to believe that:

- 1) Defendants have committed the crimes specified in the above forfeiture notice;
- 2) The property listed in ATTACHMENT 1 constituted or is derived from proceeds traceable to the intent to distribute a controlled substance, or is involved in money laundering or is property traceable to property involved in money laundering, and;
- 3) In the event of the defendants' convictions such property in ATTACHMENT 1 would be subject to forfeiture:

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS
United States Attorney



SETH NIELSEN
Special Assistant United States Attorney